

REMARKS

The following remarks are responsive to the Final Office Action mailed October 3, 2003. Applicant thanks the Examiner for the telephone interview conducted on December 4, 2003. Applicant notes with appreciation that the Examiner finds in Examiner's Interview Summary dated December 8, 2003 that Agreement was reached with respect to the Claims after our Interview.

Claims 1-49 are pending.

Claims 1, 16, 31, 34, 39 and 42 have been amended. No new matter has been introduced by the amendments made herein.

Claims 1-49 stand under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent 6,008,868 to Silverbrook ("Silverbrook") and U.S. Patent 6,188,385 to Hill et al. ("Hill").

Rejection Under 35 U.S.C. § 103(a)

Applicant submits that claims 1-49 are patentable over Silverbrook in view of Hill under 35 U.S.C. § 103(a). Neither Silverbrook nor Hill, individually or in combination, teach or suggest each and every limitation of claims 1-49.

Independent claims 1, 16, 31, 34, 39, and 42 recite a display, an array for a display, or an image capture device having a combination of elements including blue, red, and green emitters that are disposed in a rectangular coordinate system or a square in which the green and red emitters alternate at opposing corners or quadrants, or form a checkerboard pattern. Those claims further recite that at least two neighboring blue emitters **in a same row are connected to the same driver.**

Silverbrook fails to teach or suggest blue, red, and green emitters that are disposed in a rectangular coordinate system or a square in which the green and red emitters alternate at opposing corners or quadrants, or form a checkerboard pattern, as recited in claims 1, 16, 31, 34, 39, and 42. Instead, Silverbrook, as shown in FIG. 8, discloses a conventional RGB pixel layout having two red drive lines for red R subpixels, three green drive lines for green G subpixels, and one blue drive line for blue B subpixels to drive the subpixels at different levels of complexities. (Silverbrook, Abstract, col. 5, l. 59 to col. 6, l. 5). Furthermore, the green G and red R subpixels disclosed by Silverbrook neither alternate at adjacent quadrants or corners of a rectangular coordinate system or square, nor form a checkerboard pattern.

Moreover, Silverbrook fails to teach or suggest at least two neighboring blue emitters in a same row that are connected to the same driver. Instead, Silverbrook teaches one blue drive line for driving blue B subpixels in a same column. The blue drive line disclosed by Silverbrook for the blue B subpixels, however, does not connect a driver to at least two neighboring blue B subpixels in a same row.

Hill fails to cure the deficiencies of Silverbrook with respect to claims 1, 16, 31, 34, 39, and 42. Hill discloses increasing a screen's resolution in the dimension perpendicular to the dimension in which the screen is stripped, e.g., using a conventional RGB pixel sub-elements arranged lengthwise or horizontally. (Hill, Abstract, FIG. 16). Thus, like Silverbrook, Hill fails to teach or suggest blue, red, and green emitters that are disposed in a rectangular coordinate system or a square in which the green and red emitters alternate at adjacent corners or quadrants, or form a

checkerboard pattern, and at least two neighboring blue emitters in a same row are connected to the same driver, as recited in claims 1, 16, 31, 34, 39, and 42.

Therefore, for at least the above reasons, claims 1, 16, 31, 34, 39, and 42 are patentable over Silverbrook and Hill. Given that claims 2-5, 17-20, 32-33, and 35-36, and 43-46 depend on claims 1, 16, 31, 34, and 42, respectively, claims 2-5, 17-20, 32-33, and 35-36 are patentable over Silverbrook and Hill.

Independent claims 6, 11, 21, and 26 recite a three-color pixel element for a display having blue, green, and red emitters that are disposed in a rectangular coordinate system or a square in which the green and red emitters alternate at opposing corners or quadrants, and the blue emitter having an emitting area larger than that of each of the green and red emitters or the blue emitter having a larger drive-to-luminance gain than that of each of the green and red emitters. As noted above, both Silverbrook and Hill disclose conventional RGB pixel layouts and, therefore, fail to teach or suggest the blue, green, and red emitters, as recited in claims 6, 11, 21, and 26.

Therefore, for at least the above reasons, claims 6, 11, 21, and 26 are patentable over Silverbrook and Hill. Given that claims 7-10, 12-15, 22-25, and 27-30 depend on claims 6, 11, 21, and 26, respectively, claims 7-10, 12-15, 22-25, and 27-30 are patentable over Silverbrook and Hill.

Independent claims 37 and 38 recite a row structure, in an array of three-color pixel elements, and an array, respectively, having a combination of elements including first and second row line drivers and first through fifth column line drivers. Neither Silverbrook nor Hill, individually or in combination, teach or suggest at least the limitations regarding those row line drivers and column line drivers, as recited in claims

37 and 38. Therefore, for at least these reasons, claims 37 and 38 are patentable over Silverbrook and Hill.

Independent claims 40, 47, and 48 recite an image capture device, an image store device, and a display having a combination of elements including a blue emitter and a pair of green and red emitters such that green and red emitters substantially form a checkerboard pattern. As noted above, neither Silverbrook nor Hill, individually or in combination, teach or suggest at least green and red emitters substantially forming a checkerboard pattern.

Therefore, for at least the above reasons, claims 40, 47, and 48 are patentable over Silverbrook and Hill. Given that claim 41 depends on claim 40, claim 41 is also patentable over Silverbrook and Hill.

Moreover, it is respectfully submitted that neither Silverbrook nor Hill disclose or suggest a combination with each other. In particular, these references are directed to different types of displays to achieve different purposes. For instance, Silverbrook is directed to a display having a conventional RGB pixel layout with six drive lines to drive the RGB pixel layout in providing different levels of complexities. (Silverbrook, Abstract, col. 5, l. 59 to col. 6, l. 5). Hill is directed to a display having a RGB pixel layout with an increased resolution in the lengthwise dimension. Thus, it would be impermissible hindsight based on Applicant's own disclosure to combine the teachings of those references. Moreover, even if the references were combinable, these references would still fail to disclose or suggest at least the above claim elements noted above.

FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

1300 I Street, NW
Washington, DC 20005
202.408.4000
Fax 202.408.4400
www.finnegan.com

Conclusion

In view of the foregoing amendments and remarks, Applicant respectfully submits that claims 1-49 patentable over the cited art of record and are in condition for allowance. Therefore, Applicant requests the Examiner to reconsider and withdraw his rejections to all pending claims and pass this application to issue.

If the Examiner believes a telephone conference would expedite the allowance of the claims, the Examiner is invited to contact Sang Hui Michael Kim at (650) 849-6680.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: 1/16/04

By: Sang Hui Kim
Sang Hui Michael Kim
Reg. No. 40, 450

CERTIFICATE OF EXPRESS MAILING

Express Mail Label No.: EV 398930690 US

I hereby certify that this correspondence is being deposited with the United States Postal Services "Express Mail Post Office to Addressee" service under 37 C.F.R. § 1.10, addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date below.

Date: January 16, 2004

Signed: Linda Phillips

Linda Phillips

FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

1300 I Street, NW
Washington, DC 20005
202.408.4000
Fax 202.408.4400
www.finnegan.com